

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VALE S.A.,

Petitioner,

-against-

BSG RESOURCES LIMITED,

Respondent.

Case No. 19-cv-3619 (VSB)

**NOTICE OF MOTION TO COMPEL COMPLIANCE  
WITH THE DISCOVERY REQUESTS SERVED ON  
BENJAMIN (BENY) STEINMETZ AS ALTER EGO OF BSGR**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Declaration of Jeffrey A. Rosenthal and all exhibits thereto, and Declaration of Lisa Vicens and all exhibits thereto, Petitioner Vale S.A. will move in the United States District Court for the Southern District of New York, before the Honorable Vernon S. Broderick, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 518, New York, New York, at a date and time to be determined by the Court, for an order compelling Benjamin (Beny) Steinmetz to respond to the discovery requests served on March 31, 2020 and for such other relief as this Court deems just and proper.

Dated: May 14, 2021  
New York, New York

Respectfully submitted,

/s/ Jeffrey A. Rosenthal  
Jeffrey A. Rosenthal  
Lisa M. Schweitzer  
Lisa Vicens  
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